

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

RUSSELL DRIVER

Criminal No. 4:21-CR-200-O

FACTUAL RESUME

INFORMATION: Count One: Conspiracy to Possess with Intent to Distribute a Controlled Substance (methamphetamine) (in violation of 21 U.S.C. § 846, and 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

PENALTY: \$1,000,000 fine - imprisonment for a period not to exceed twenty (20) years, or both such fine and imprisonment, plus a term of supervised release of not less than 3 years.

MAXIMUM PENALTY:

\$1,000,000 fine and imprisonment for a period not to exceed twenty (20) years, plus a term of supervised release of not less than 3 years. If the defendant violates any condition of supervised release, the Court may revoke such term of supervised release and require the defendant to serve an additional period of confinement. Further the Court must impose a Mandatory Special Assessment of \$100.00.

ELEMENTS OF THE OFFENSE:

The essential elements which must be proved beyond a reasonable doubt in order to establish the offenses charged in Count One of the Information are as follows:

First: That two or more persons, directly or indirectly, reached an agreement to distribute or possess with intent to distribute a controlled substance, as charged in the information;

Second: That the defendant knew of the unlawful purpose of the agreement;

Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose;


Fourth: That the overall scope of the conspiracy involved a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance; and

Fifth: That the defendant knew or reasonably should have known that the scope of the conspiracy involved a detectable amount of methamphetamine, a Schedule II controlled substance.

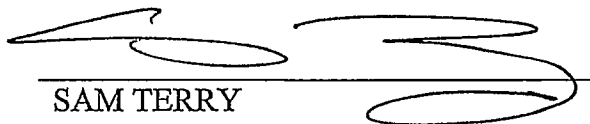
STIPULATED FACTS:

Beginning on a date unknown but no later than in or about June 2021, RUSSELL DRIVER, has delivered methamphetamine to various customers in the Northern District of Texas. RUSSELL DRIVER used various methamphetamine suppliers. In this manner, RUSSELL DRIVER conspired with others to possess a detectable amount of methamphetamine with the intent to distribute it.

SIGNED this 29th day of July, 2021.



RUSSELL DRIVER
Defendant



SAM TERRY
Counsel for Defendant